

Appl. No. 09/960,064  
Amendment and/or Response  
Reply to Office action of 2 October 2003

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REMARKS / DISCUSSION OF ISSUES

Claims 1-18 are pending in the application.

The Office action rejects claims 1-18 under 35 U.S.C. 102(b) as being anticipated by Brassell et al. (USP 5,684,510, hereinafter Brassell). The Applicant respectfully traverses this rejection.

Claim 1, upon which claims 2-9 depend, specifically claims a rendering system that includes a *force* modeler that *models forces* applied to a glyph *dependent upon the placement* of the glyph. Claim 10, upon which claims 11-18 depend, specifically claims a method of rendering a glyph that includes *modeling forces* that are applied to the glyph in *dependence upon a placement of the glyph*.

The Office action asserts that Brassell's parameters P, J, and K, correspond to the Applicant's claimed forces that are applied to the glyph dependent upon the placement of the glyph. The Applicant respectfully traverses this assertion.

Brassell's parameter P is the height of the glyph (Brassell column 15, lines 40-41); it is not a force, and its value is not dependent upon the placement of the glyph.

Brassell's parameter J is an integer that "controls whether hinting will be employed when rendering the glyphs" (Brassell column 15, lines 46-47); it is not a force, and its value is not dependent upon the placement of the glyph.

Brassell's parameter K is an integer that "determines whether ... the resulting display will be bilevel or grayscale" (Brassell column 15, lines 47-50); it is not a force, and its value is not dependent upon the placement of the glyph.

Specifically, the parameters J and K are either found in the font description file, or they are assigned a default value (Brassell column 16, lines 18-33). These parameter values, and the height of the glyph, are determined prior to the placement of the glyph (Brassell's FIG. 6), and thus cannot be said to be dependent upon the placement of the glyph.

Because Brassell does not teach modeling forces, and specifically does not teach modeling forces that are dependent upon the placement of the glyph, as specifically claimed in the Applicant's claims 1 and 10, upon which each of the other claims depends, the Applicant respectfully requests the Examiner's reconsideration of the rejection of claims 1-18 under 35 U.S.C. 102(b) as being anticipated by Brassell.

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The Office action rejects claims 8 and 17 under 35 U.S.C. 112, second paragraph, for the use of the term "at least one of" with regard to the type of force models that may be applied, and suggests that the claim be limited to the use of "one of" the types of force models. The Applicant respectfully traverses this rejection, and requests the Examiner's reconsideration, based on the following remarks.

One of ordinary skill in the art will recognize that rendering glyphs in an attractive form is as much an art as a science, and that combinations of force models may be used, dependent upon the particular effects provided. The following examples are presented for illustrative purposes, and are not intended to limit the claims to any particular combination of force models:

The force model used for adjusting the inter-character spacing of letters may differ from the force model used for adjusting the placement of individual characters. Similarly, the force model used to constrain the vertical base of each character may differ from the force model used for adjusting the individual extents of each character. In like manner, a combination of linear force modeling and spring force modeling may be used to model varying spring forces as a function of distance from the vertical base. Further, the force model used in the horizontal direction may differ from the force model used in the vertical direction. These and other combinations of algorithms and force models will be evident to one of ordinary skill in the art in view of the Applicant's specification.

In view of the foregoing, the Applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Robert M. McDermott, Attorney  
Registration Number 41,508  
patents@lawyer.com

1824 Federal Farm Road  
Montross, VA 22520  
Phone: 804-493-0707  
Fax: 215-243-7525

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